

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JIMMIE LEWIS,

- VS -

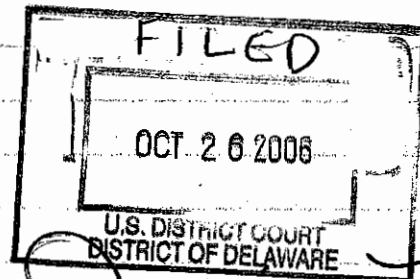
CA NO. 04-1350 (GMS)

DR. SYLVIA FOSTER, ET AL.

PLAINTIFF'S MOTION FOR DISCOVERY # VII

COMES NOW, THE PLAINTIFF JIMMIE LEWIS PRO SE
AND SUBMITS THIS MOTION FOR DISCOVERY IN
ACCORDANCE WITH THE HONORABLE JUDGE GREGORY
M. SLEET'S JULY 28, 06 COURT ORDER, IN ORDER TO
BRING FORTH THE TRUTH, THE WHOLE TRUTH AND
NOTHING BUT THE TRUTH, AND ASSERTS THE FOLLOWING:

DATE: 10/23/06



Jimmie Lewis
#BI# 506622

DEL. CORR. CENTER
1181 PADDOCK RD
SMYRNA, DE 19977

- 1.) WOULD THE DEFENDANTS OBJECT TO THE PLAINTIFF CONTACTING THE MEDIA
- 2.) DOES THE RATE OF SIDE EFFECTS TO PSYCHOTROPICS INCREASE OVER TIME.
- 3.) DID THE PLAINTIFF REQUEST TO RECEIVE ANY PRN PSYCHOTROPIC DRUGS INTRAVENOUSLY, IF YES, ON WHAT DATE, WHO INJECTED SAID PRN PSYCHOTROPIC DRUGS, NAME THE PSYCHOTROPIC DRUGS, AND WHO ORDERED THE STANDING PRN PSYCHOTROPIC DRUGS.
- 4.) DR. FOSTER, DOES THE STATEMENTS NOTED IN ANNABEL LEE FIELDS MAY 24, 04 TP3 PSYCHOLOGICAL ASSESSMENT UNDER THE TITLE, "AFFECT - THOUGHT PROCESS", THE MISSING PERSON'S ADD OF THE PLAINTIFF PLACED 7 DAYS PRIOR TO HIS ARREST ON MAY 26, 03, THE PLAINTIFF'S WILM POLICE DEPT DETAINEE ASSESSMENT PROPERTY RECEIPT, THE PLAINTIFF'S MENTAL HEALTH TREATMENT PLAN, ALONG WITH YOUR STATEMENT NOTED IN YOUR JUNE 10, 04 FORENSIC REPORT, UNDER THE TITLE "OPINION", (ATTACHED AS ~~MH~~ - EXHIBIT), STATING, THESE OPINIONS ARE SUBJECT TO CHANGE IF ADDITIONAL INFORMATION OR RECORDS BECOME AVAILABLE; SIGNIFY THAT THE PLAINTIFF MAY NOT HAVE ACKNOWLEDGED THE WRONGFULNESS OF THE CRIMINAL ACTS PLACED AGAINST HIM ON MAY 26, 03, IF NO, STATE THE REASONS WHY.

5.) ON OR ABOUT 5/19/03 SEVEN DAYS BEFORE THE PLAINTIFF WAS ARRESTED ON 5/26/03 (SEE ATTACHED EXHIBITS), THE PLAINTIFF'S MOTHER PLACED A MISSING PERSONS ADD IN THE NEWARK N.J STAR LEDGER - NEWSPAPER, THAT RAN FOR TWO MONTH, SEEKING THE PUBLIC'S ASSISTANCE IN FINDING THE PLAINTIFF, STATING DIAGNOSES SUCH AS SCHIZOPHRENIA AND BIPOLAR DISORDER. QUESTION(S), DID DR. FOSTER CONTACT LT. DEREK BLEN WHEN SAID ARTICLE WAS GIVEN TO HER, AND WHY DIDN'T DR. FOSTER NOTE THE PLAINTIFF WAS REPORTED AS A MISSING PERSON WHEN SHE AUTHORED HER JUNE 10, 04 FORENSIC REPORT.

6.) DR. FOSTER'S JUNE 10, 04 FORENSIC REPORT NOTES, UNDER THE TITLE "CURRENT MENTAL STATUS EXAM", THAT THE PLAINTIFF DENIED PARANOIA, DELUSIONS AND HYPER-RELIGIOSITY. (DENIED BY THE PLAINTIFF). IN SUPPORT OF THE PLAINTIFF'S DENIAL, ANNABEL LEE FIELDS MAY 24, 04 TP3 PSYCHOLOGICAL ASSESSMENT NOTES UNDER THE TITLE "AFFECT - THOUGHT PROCESS", THAT THE PLAINTIFF INDEED DID REPORT PARANOIA, DELUSIONS AND HYPERRELIGIOSITY. DOES THE DEFENDANT DR. FOSTER ADMIT THAT THE NOTES DOCUMENTED IN ANNABEL LEE FIELDS MAY 24, 04 TP3 REPORT UNDOUBTEDLY VARIFIES THAT SHE LIED WHEN SHE AUTHORED HER JUNE 10, 04 FORENSIC REPORT REGARDING THE SAID ISSUES NOTED HEREIN, IF NO, STATE WHY NO.

7.) DR. FOSTER, IS THERE ANOTHER TERM THAT COULD HAVE BEEN UTILIZED IN THE JUNE 10, 04 FORENSIC REPORT, INSTEAD OF MALINGERING, THAT WOULD HAVE DEFINED THAT THE PLAINTIFF WAS STABLE AND OR COMPETENT.

8.) PROVIDE RONALD STEVEN'S ADDRESS, AN INMATE PATIENT THAT WAS AT THE D.P.C DURING THE PLAINTIFF'S STAY AT THE D.P.C FROM 5/21/04 TO 6/25/04

9.) PROVIDE JAMES SMITH'S ADDRESS, AN INMATE PATIENT THAT WAS AT THE D.P.C DURING THE PLAINTIFF'S STAY AT THE D.P.C FROM 5/21/04 TO 6/25/04.

10.) WHO HANDLES THE D.P.C INMATE DISCIPLINARY PROCEDURE.

11.) IS THERE A D.P.C DISCIPLINARY PROCEDURE, IF YES, DESCRIBE THE D.P.C DISCIPLINARY PROCEDURE.

12.) PROVIDE THE D.P.C DISCIPLINARY PROCEDURE RULES AND REGULATION HANDBOOK.

13.) IS THORAZINE A PSYCHOTROPIC

14.) IS DEPAKOTE A PSYCHOTROPIC

15.) IS VISTARIL A PSYCHOTROPIC

16.) IS RISPERDAL A PSYCHOTROPIC

17.) BECAUSE THE 11/17/03 DATE STATED AS THE DATE THE PLAINTIFF WAS ARRESTED, NOTED IN DR. FOSTER'S JUNE 10, 04 FORENSIC REPORT, DOESN'T RELATE TO ANYTHING REGARDING THE CRIMINAL OFFENSE THAT THE PLAINTIFF IS IN CARCERATED FOR, NOR DOES 11/17/03 RELATE TO THE REASONS THE PLAINTIFF WAS ORDERED TO UNDERGO A COMPETENCY EVALUATION AND TO RECEIVE TREATMENT FOR HIS VERY OWN WELL BEING, GIVES PARTIAL REASON WHY THE PLAINTIFF DRAW THE INFERENCE OF CONSPIRACY BETWEEN DR. FOSTER AND THE STATES DISTRICT ATTORNEY BRIAN J. ROBERTSON, BECAUSE ON 11/18/03 D.A BRIAN J. ROBERTSON FILED A PETITION SEEKING FELONY CONVICTION INFORMATION FROM THE ELEVENTH CIRCUIT COURT OF MIAMI FL, IN ORDER TO SENTENCE THE PLAINTIFF AS AN HABITUAL OFFENDER UNDER 11 DEL C.S (SEE ATTACHED EXHIBIT)

DOES THE DEFENDANT DR. FOSTER ADMIT THAT THE REASON THE 11/17/03 DATE IS NOTED IN HER JUNE 10, 04 FORENSIC REPORT AS THE DATE OF THE PLAINTIFF'S ARREST, IS BECAUSE SHE CONSPIRED WITH THE STATES D.A BRIAN J. ROBERTSON, AND THEREFORE DIAGNOSED THE PLAINTIFF AS MALINGERING IN ORDER TO SO THAT THE D.A COULD PROCEED WITH HAVING THE PLAINTIFF SENTENCED AS AN HABITUAL OFFENDER, IF NO, WHAT DOES THE 11/17/03 DATE NOTED IN DR. FOSTER'S JUNE 10, 04 FORENSIC REPORT RELATE TO.

CERTIFICATE OF SERVICE

I, THE UNDERSIGNED PLAINTIFF JIMMIE LEWIS
DUE HEREBY CERTIFY ON THIS 23RD, DAY OF OCT,
2006, THAT I DID MAIL BY U.S. POSTAL ONE TRUE
AND CORRECT COPY OF THE PLAINTIFF'S MOTION FOR
DISCOVERY # VII, TO THE FOLLOWING:

CLERK OF THE COURT (GMS) CYNTHIA G. BEAM ESQ
UNITED STATES DISTRICT COURT 1001 JEFFERSON PLAZA, SUITE 202
J. CALEB BOGGS FEDERAL BUILDING WILMINGTON, DE 19801
844 N. KING ST, LOCKBOX 18
WILMINGTON, DE 19801

GREGORY E. SMITH
DEPUTY ATTORNEY GENERAL
820 N. FRENCH ST, 7TH FL.
WILMINGTON, DE 19801

DATE: 10/23/06

Jimmie Lewis
SDI # 506622
DEL. CORR. CENTER
1181 PADDOCK RD
SMYRNA, DE 19977

IM Jimmie Lewis

SBI# 506622 UNIT C-4-1

DELAWARE CORRECTIONAL CENTER

1181 PADDOCK ROAD

SMYRNA, DELAWARE 19977



CLERK OF THE COURT (GMS)

UNITED STATES DISTRICT COURT

844 N. KING ST, LOCKBOX

WILMINGTON, DELAWARE

19801

U.S. MAIL